

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHICAGO ORNAMENTAL IRON, INC., et al.)	
)	
Plaintiff,)	Case No. 1:25-cv-05131
v.)	
)	District Judge: Hon. Mary M.
SELECTIVE INSURANCE CO. OF)	Rowland
AMERICA, et al.)	
)	Magistrate Judge: Hon. Young B.
Defendants.)	Kim

**JOINT MOTION TO EXTEND MOTION TO COMPEL DEADLINE
AND TO SET DISCOVERY SCHEDULE**

The parties, plaintiffs Chicago Ornamental Iron, Inc., 4340 W. 47th St. LLC, and 4340 Holdings LLC (collectively, “plaintiffs”) and defendants Selective Insurance Company of America (“Selective”) and AssuredPartners of Illinois, LLC (“AssuredPartners”), jointly move to extend the motion to compel date and to set discovery schedule.

1. Plaintiffs filed this four-count action on April 3, 2025, in the Circuit Court of Cook County, Illinois. The action arises from the roof collapse of plaintiffs’ building following a heavy rainstorm and their resulting claim for insurance coverage. Plaintiffs allege that the total loss exceeded \$20 million. Plaintiffs assert claims against Selective, the defendant insurer, for breach of contract (Count I), violation of the Illinois Insurance Code (Count II), and violation of the Illinois Consumer Fraud Act (Count III). Plaintiffs assert a claim against AssuredPartners, the defendant insurance broker, for professional negligence (Count IV).

2. On May 8, 2025, AssuredPartners removed the action to this Court based on diversity jurisdiction. (ECF No. 1.)

3. Both defendants answered plaintiffs' complaint and asserted affirmative defenses. (ECF Nos. 4, 16.)

4. The parties have been at issue on the pleadings since May 22, 2025.

5. On September 26, 2025, the Court entered an order setting an October 24, 2025, deadline for the filing of motions to compel by all parties. (ECF No. 43.) The order also struck the unexpired discovery deadlines set forth in the Court's June 4, 2025, order (ECF No. 21).

6. The parties have since met and conferred regarding open discovery issues and are working cooperatively to resolve the outstanding issues. Specifically, the parties have agreed to supplement their discovery responses, which will require an additional 14 days from today, which would be November 4, 2025.

7. Accordingly, the parties now request that the Court extend the deadline for motions to compel from October 24, 2025, to November 14, 2025.

8. Further, the parties request that the Court reset the discovery schedule as stricken in its September 26, 2025, order, and propose the following discovery schedule to be adopted by the Court:

- (a) November 4, 2025, for completion of written discovery;
 - (b) February 6, 2026, for completion of fact witness and oral discovery;
 - (c) March 27, 2026, for plaintiffs' expert disclosures and reports;
 - (d) April 24, 2026, for defendants' expert disclosures and reports;
 - (e) June 10, 2026, for depositions of plaintiffs' experts; and
 - (f) July 15, 2026, for depositions of defendants' experts.
9. This is the parties' second request to extend the discovery schedule.

Wherefore, plaintiffs Chicago Ornamental Iron, Inc., 4340 W. 47th St. LLC, and 4340 Holdings LLC, defendant Selective Insurance Company of America, and defendant AssuredPartners of Illinois, LLC, respectfully request that this Honorable Court extend the motion to compel deadline by 21 days to November 14, 2025, and to adopt the discovery schedule, as reflected herein.

Respectfully submitted,

By: /s/ Richard M. Goldwasser
One of the Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2025, a true and correct copy of the foregoing document has been filed electronically and served on the parties via the Court's electronic filing system or by mail to anyone unable to accept electronic filings. Parties may access this filing through the Court's CM/ECF system.

/s/ Richard M. Goldwasser
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